



Steven F. Molo
MoloLamken LLP
430 Park Avenue
New York, NY 10022
T: 212.607.8170
F: 212.607.8161
smolo@mololamken.com
www.mololamken.com

October 15, 2020

BY CM/ECF AND EMAIL

Hon. Analisa Torres
United States District Court
Southern District of New York
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street
New York, NY 10007-1312

Re: *Contrarian Capital Management, LLC v. Bolivarian Republic of Venezuela*,
19 Civ. 11018 (S.D.N.Y.) (rel. Nos. 19 Civ. 3123 & 18 Civ. 11940):
Revised Proposed Judgment

Dear Judge Torres:

We represent the Plaintiffs. After meeting and conferring with the Republic, we have filed today a revised proposed judgment consistent with this Court's order granting summary judgment in favor of Plaintiffs, Dkt. 74, and this Court's order granting Plaintiffs an extension of time to file their proposed judgment, Dkt. 76. Plaintiffs have filed this revised version at the Republic's request to specify the principal, coupon interest, and prejudgment interest awarded to each Plaintiff fund for each bond. The revised proposed judgment has also been updated to reflect the amount due on Plaintiffs' claims as of October 15, 2020.

The figures for principal, unpaid coupon interest, and prejudgment interest have been shared with counsel for the Republic, who advised that they have no comments. However, the Republic still takes the position (with which Plaintiffs disagree) that the judgment should contain the "fraud-prevention" terms which it requested in its summary-judgment briefing. *See* Dkt. 69 at 29-30 & n.48.

Respectfully submitted,

/s/ Steven F. Molo
Steven F. Molo